

1 John T. Steffen (4390)
2 Jeffrey R. Hall (9572)
3 Todd W. Prall (9154)
HUTCHISON & STEFFEN, PLLC
4 Peccole Professional Plaza
10080 Alta Drive No. 200
5 Las Vegas, Nevada 89145
Telephone: (702) 385-2500
Facsimile: (702) 385-2086
6 email: jhall@hutchlegal.com

7 Attorneys for Las Vegas Jaycees
8 Senior Citizen Mobile Home Park

9 **UNITED STATES BANKRUPTCY COURT**

10 **DISTRICT OF NEVADA**

11 In re:
12
13 URSULA LICHTENSTEIN,
14 Debtor.

Case No.: 25-10340-nmc
Chapter 13

15
**LAS VEGAS JAYCEES SENIOR
CITIZENS MOBILE HOME PARK'S
OBJECTION TO CONFIRMATION OF
PLAN**

16
17 Las Vegas Jaycees Senior Citizen Mobile Home Park ("Jaycees"), through its counsel
18 Hutchison & Steffen, PLLC, submits this objection to the Plan submitted by debtor:

19 **1. Jaycees objects to exemption claimed concerning a manufactured home as exempt
20 under NRS 115.010.**

21 Debtor claims that a certain manufactured home identified as a 1994 Champion Infinity
22 II, with the serial number 09946364387AB (the "Manufactured Home") is an asset of the estate
23 exempted from execution under NRS 115.010. Debtor has not shown that NRS 115.010 applies.
24 First, the Manufactured Home was transferred out of Debtor's name in December 2024. Second,
25 even if the Manufactured Home is somehow brought back into the Estate or the Debtor has some
26 equitable interest in the Manufactured Home, the Debtor can no longer assert that the
27

1 Manufactured Home is a protected under NRS 115.010 as a homestead. The Debtor is not
2 supposed to be living in the home based on both the eviction and based on the criminal no-
3 contact orders. The Debtor transferred the home in a manner that suggests it was a fraudulent
4 transfer, which would nullify any claimed homestead. The Manufactured Home is set to be sold,
5 and Debtor will not be living there any longer.
6

7 **2. The plan does not account for the debt owed to Jaycees or the value of the
8 Manufactured Home which could cover all of the potential debts of the estate.**

9 The plan does not provide any provision for paying Jaycees' judgment. However, the
10 judgment could easily be paid if the Manufactured Home were part of the estate. Because the
11 plan provides payments for Jaycees debt and because the Manufactured Home could fully satisfy
12 that debt, the plan should not be confirmed.
13

14 Further, Jaycees concurs with the trustee's recommendations that the bankruptcy be
15 dismissed because there appears to be sufficient assets to cover all the debts.
16

Dated this 29th day of April 2025.

17 HUTCHISON & STEFFEN, LLC
18

19 */s/ Jeffrey R. Hall*

20 By: _____
21 John T. Steffen (4390)
22 Jeffrey R. Hall (9572)
22 Todd W. Prall (9154)
23 Peccole Professional Plaza
23 10080 Alta Drive No. 200
23 Las Vegas, Nevada 89145
24

25 *Attorneys for Las Vegas Jaycees
26 Senior Citizen Mobile Home Park*
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1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that on the 29th day of April 2025, a copy of the
3 following document entitled: ***LAS VEGAS JAYCEES SENIOR CITIZENS MOBILE HOME***
4 ***PARK'S OBJECTION TO CONFIRMATION OF PLAN*** was served by Personally
5 transmitting a copy of same via the Court's CM/ECF Internet system to their respective
6 registered email site.

7 Gregory L. Wilde
8 Wilde & Associates
9 7473 W. Lake Mead Blvd., Suite 100
10 Las Vegas, NV 89128
11 greg@wildelawyers.com

12
13 */s/ Bobbie Benitez*

14 An employee of Hutchison & Steffen, PLLC